

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION

MDL NO. 16-2738 (FLW) (LHG)

THIS DOCUMENT RELATES TO ALL CASES

**STIPULATION AND PRETRIAL ORDER APPROVING EXTENSION OF TIME FOR
PLAINTIFFS TO RESPOND TO MOTION TO DISMISS OF PERSONAL CARE
PRODUCTS COUNCIL (“PCPC”) TO PLAINTIFFS’ MASTER LONG FORM
COMPLAINT AND FOR PCPC TO FILE REPLY TO PLAINTIFFS’ RESPONSE**

WHEREAS, on January 5, 2017, Plaintiffs, by and through their counsel and pursuant to Case Management Order No. 1 (“CMO-1”), filed their Master Long Form Complaint against Defendants Johnson & Johnson (“J&J”) and Johnson & Johnson Consumer Inc. f/k/a Johnson & Johnson Consumer Companies, Inc. (“J&J Consumer”), Imerys Talc America, Inc., f/k/a Luzenac America, Inc., f/k/a Rio Tinto Minerals, Inc. (“Imerys Talc”) and Personal Care Products Council (“PCPC”) (collectively referred to as “Defendants”) (Doc. No. 82); and

WHEREAS, on February 6, 2017, Defendant PCPC filed a Motion to Dismiss the Master Long Form Complaint (Doc. No. 100); and

WHEREAS, Defendants J & J, J & J Consumer and Imerys Talc have informed Plaintiffs that they intend on filing Master Answers to the Master Long Form Complaint on or before the respective due dates for their Master Answers of March 15, 2017 for J & J and March 16, 2017 for Imerys; and

WHEREAS, pursuant to Paragraph 11 of CMO-1 Plaintiffs and Defendant PCPC consider that Plaintiffs' response to Defendant PCPC's Motion to Dismiss the Long Form Master Complaint to be due on March 8, 2017 (30 days after the filing of the Motion); and

WHEREAS, Plaintiffs and Defendant PCPC have agreed that Plaintiffs shall have an extension of time to file their response and opposition to Defendant PCPC's Motion to Dismiss the Master Long Form Complaint until April 11, 2017; and

WHEREAS, Plaintiffs and Defendant PCPC have agreed that Defendant PCPC shall have an extension of time to file a reply to Plaintiffs response and opposition to Defendant PCPC's Motion to Dismiss until April 25, 2017.

NOW, THEREFORE, it is hereby agreed to by and between Plaintiffs and Defendant PCPC, subject to Court approval to be provided for below, that Plaintiffs shall have an extension of time to respond and oppose Defendant PCPC's Motion to Dismiss Plaintiffs' Master Long Form Complaint until April 11, 2017 and that Defendant PCPC's reply, if any, to Plaintiffs' response and opposition to Defendant PCPC's Motion to Dismiss shall be due on April 25, 2017.

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**Attorneys for Defendant
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Approved by the Court this 15th day of March, 2017.



Hon. Freda L. Wolfson, U.S.D.J.